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MEMORANDUM FOR: Deputy Director for Administration

FROM : Gene F. Wilson
Chief, Information and Privacy Staff

SUBJECT : PMCD Grade Evaluation of the Information and
Privacy Staff

1. Thank you for the opportunity to provide a rebuttal to the OP/Position Management and Compensation Division proposed grade structure for IPS. In reviewing the PMCD survey, I would generally agree with their grade recommendations in all but four positions. Let me address those positions:

a. Document Control Analyst/Supervisor: This position is currently on the position control roster and was proposed to be continued as a GS-09 position. The incumbent supervises two people and controls the office logs, files and assignment of new cases. The incumbent often prepares much of the initial correspondence to the requester. Because of our continued heavy volume and the developing writing skills, the incumbent does not now originate much correspondence beyond form letters. As IPS contracts in size and case officers depart, however, this position will increase in complexity and responsibility. The incumbent is a GS-08. I would like to see a GS-08 in the position, but I cannot make a particularly strong case at this time.

b. Info Control Supervisor: This is really three positions rolled into one. The incumbent is a secretary steno to Chief, IPS; administrative assistant for the entire staff; and thirdly, and most importantly, she is the typing pool or word processing (to be contemporary) supervisor directing the activities of four typists ranging up to GS-06 level. This responsibility includes training, proofreading, assignment of work, assignment of overtime, and controlling the flow of an average of 70 letters per day to the public. Believe me, this is not a case of exaggerating the duties of a secretary. PMCD's evaluator had some difficulty in locating a benchmark for the comparison of these duties. The closest parallel that could be drawn was a supervisor of the OTR word processing unit. This month I spent one hour in OTR reviewing that job and that operation. I

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submit that the IPS position meets, and in some areas exceeds, the difficulties and responsibility of the OTR GS-08 position. I feel strongly that the IPS position should be at the GS-08 level.

c. The Chief and Deputy Chief of IPS must be considered as one problem. I question PMCD's external job comparison data. In order to determine a comparison, on 5 April 1976 I contacted the FBI, the organization which I believe most closely parallels ours with respect to difficulty and complexity of FOIA and Privacy Act requirements. Contrary to the finding of PMCD, I was advised that Mr. James Power, Chief of their FOIA and Privacy Section, is a GS-16 and his Deputy, Mr. Al McRite, is a GS-15. This organization is responsible for the initial responses and for processing appeals, but not litigation. Below the section level are four units, each headed by a GS-15. Within the units, there are supervisors at the GS-14 level who review the work done by analysts who range in grade from GS-07 to GS-11.

I do not agree with PMCD's determination that the Information and Privacy Coordinator is a position with the same level of responsibility as the head of the Office of Security's FOIA unit. I was surprised at the statement made by PMCD in its job audit that states, "A major factor in the GS-15 of the Office of Security position was the responsibility for substantive research and for making determinations as to what may be released to the public, a responsibility not inherent in the Chief, IPS position." This is not accurate. The Chief, IPS, must daily make decisions on what is released to the public, both written and oral. Hours of each working day are spent by the Chief and Deputy Chief of IPS reviewing determinations made by Agency components, negotiating changes, and coordinating responses to assure conformity with Agency standards for compliance with the requirements and spirit of the FOI and Privacy Acts. Difficulties in dealing with the public and particularly with the various elements of the press, as they become more knowledgeable of the Acts, have increased in intensity even since this position evaluation was conducted six months ago. For example, on 31 March the Chief, IPS spent one hour on a one-to-one interview with Harper's Magazine and the following hour with a writer from the Washington Post.

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2. The PMCD report and recommendations, in my judgment, present a very simplistic view of the IPS operation. The evaluator emphasized the handling of the routine request for personal records, but demonstrated no depth of understanding of the complexity of many of the other requests, or of the critical role played by the staff in coordinating and reconciling conflicting positions taken by Agency components. (The recent review of the Dulles-Jackson-Correa Report is a good example.) It is entirely possible, if not probable, that IPS staff members failed to devote sufficient time to the interviews and were thus responsible for the failure of the evaluator to gain any depth of understanding of the operation. I accept full blame for this, if such was the case.

3. I do appreciate the opportunity to make my pitch and understand the complication of the final determination. I fully understand that once a determination has been made I will not belabor my concern over the slotting of IPS.



Gene F. Wilson

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